

United States District Court
For Eastern District of Pennsylvania

ANDREA CONSTAND,

Plaintiff,

v.

WILLIAM H. COSBY, JR.

Defendant.

CIVIL ACTION NO:

05-cv-1099

**ORAL ARGUMENT
REQUESTED**

MOTION TO INTERVENE
M. EUGENE GIBBS-SQUIRES [Esq.]

NOW COMES, M. Eugene Gibbs-Squires pursuant to FRCP, Rule 24(a)(2) and/or 24(b)(1)(B) and moves this Honorable Court grant his motion to intervene. The reasons for said motion are more fully set forth below:

1. I submit this motion to intervene; to address the invitation to do so; extended by Defendant William H. Cosby Jr. [Hereinafter Cosby]. On Friday, Nov. 21, 2014, Cosby gave a response to the sexual assault claims to *Florida Today* – stating, "I know people are tired of me not saying anything, but a guy doesn't have to answer to innuendos. People should fact-check." ADDITIONALLY, on Sunday, November 16, 2014 an attorney for Cosby, John P. Schmitt, called the allegations "decade-old" and "discredited," ... *CNN Money*. AND, Gibbs believes evidence pertaining to the "stolen art" is contained in the deposition the Associated Press petitioned this Honorable Court to release. This Court granted the petition to the extent the deposition was released in part.

2. I am a retired New York City police officer, and the attorney of record: in the litigation of the largest art conspiracy and racketeering corrupt organization (RICO) in America's history. The individuals listed, *infra*, are those alleging criminal conduct by the Defendant. I've used resources acquired as a police officer and attorney, print and video media, social media, reference materials and the internet. My through investigation cannot produce any evidence the "allegations" referenced were "old discredited allegations." Additionally,

Innuendo – insinuation, suggestion, implication, intimation, allusion, hint or overtone.

3. The Defendant, William H. Cosby, Jr. (Hereinafter Cosby), his Curator, Dr. David Driskell and the Smithsonian Institution, alleged Gibbs was "mentally ill" and Gibbs' claims as to stolen art was delusional. "They" threatened to sue a reporter and Channel 21 News of Montgomery County, Maryland for slander.

a. Gibbs provided uncontroverted proof: Dr. David Driskell stole 100 works of art from Fisk University - \$100 million.

b. Dr. Driskell "formed" sexual relationships with Dr. Richard Powell and other curators in order to steal works of art valued at \$300 million from Historical Black Colleges and Universities (HBCU). Dr. David Driskell facilitated the Smithsonian Institution's theft of Black art valued at \$10 [B]illion.

c. Cosby, Dr. Driskell and Julian Bond's theft of art from the Dr. Barnes Art Trust [\$30 Billion], forced Lincoln University to accept a \$50 million bribe to relinquish control of the Dr. Barnes Art Trust.

4. In or about the spring of 2005, Gibbs provided Plaintiff's attorney with documented evidence of Cosby's criminal behavior: the same information Gibbs used to filed 15 complaints with the FBI, Justice Department, and multiple RICO suits.

5. Gibbs has not uncovered a single instance whereby an innuendo has been used to describe the actions of Bill Cosby. The women have given very personal and detailed accounts of their encounters with Bill Cosby, to wit:

February 10, 2005

Tamara Green (Plaintiff), a California lawyer, appears on the *Today Show* and alleges that Cosby drugged and sexually assaulted her in the 1970s. Green tells Matt Lauer that Cosby, who had given her pills to combat a fever, drove her to her apartment and began "... groping me and kissing me and touching me and handling me and ... taking off my clothes." According to Green, Cosby left two \$100 bills on her coffee table afterwards. Cosby's lawyer issues a statement: "Miss Green's allegations are absolutely false. Mr. Cosby does not know the name Tamara Green or Tamara Lucier [her maiden name], and the incident she describes did not happen. The fact that she may have repeated this story to others is not corroboration."

March 8, 2005

Andrea Constand files a civil complaint against Cosby. The five-count lawsuit charges Cosby with battery and assault.

June 23, 2005

Philadelphia Daily News, Jane Doe 5 goes public. Beth Ferrier claims she was in a relationship with Cosby in the mid-1980s, one that ended when he allegedly drugged her coffee and Ferrier woke in a car. Bill Cosby is "dubbed" **Dr. Huxtable and Mr. Hyde**.

December 2006

The following month, *People Magazine* publishes Barbara Bowman's account of several assaults: "It was in a hotel in Reno, claims Bowman, that Cosby assaulted her one night in 1986.

February 2014

Katie Baker of *Newsweek* — Whitaker's former employer — interviews both Green and Bowman about the alleged assaults.

October 16, 2014

Comedian Hannibal Buress does an extended bit about the rape charges in Cosby's home town of Philadelphia.

November 10, 2014

To battle the bad press, Cosby's PR team launches an online meme generator. Twitter is immediately inundated with references to the rape claims.

November 13, 2014

Inspired by the reactions to Buress's bit, Bowman pens an op-ed in the Washington Post, titled "Bill Cosby raped me. Why did it take 30 years for people to believe my story?"

November 15, 2014

Cosby is asked about the various charges on NPR's "Weekend Edition" but stays silent. His lawyer later posts a statement saying Cosby "won't dignify these allegations with any response."

November 16, 2014

A new accuser, Joan Tarshis, alleges that Cosby drugged and assaulted her on two occasions in 1969.

November 17, 2014

Linda Joy Traitz, a former waitress at Cosby's Café Figaro, writes a lengthy FaceBook post accusing the actor of trying to drug her in the early '70s.

November 18, 2014

On *Entertainment Tonight*, supermodel Janice Dickinson becomes the next woman to accuse Cosby of sexual abuse, saying the comedian drugged and raped her in 1982. Dickinson alluded to the event in her 2002 memoir, and later told Howard Stern she was asked to change the text to show Cosby in a better light.

November 20, 2014

Three more women accused the comedian of sexual assault on Thursday, while producers behind The Cosby Show claimed ignorance. Actress Louisa Moritz, who played Rose in *One Flew Over the Cuckoo's Nest*, told TMZ that Cosby forced her to engage in oral sex before a 1971 Tonight Show appearance; Carla Ferrigno (Lou Ferrigno's wife) told *Rumorfix* he attacked and grabbed her at a party in 1967; and Therese Serignese, a Florida nurse, told the Huffington Post that he drugged and raped her in 1976.

November 21, 2014

Three more accusers step forward. All tell similar stories: Kristina Ruehli says Cosby spiked her bourbon and forced her to perform oral sex in 1965; Picture Pages actress Renita Chaney Hill alleges Cosby drugged and assaulted her multiple times when she was a teenager; and model

Angela Leslie contends that Cosby invited her to his Las Vegas hotel room in 1992, got naked, then forced her to masturbate him. **Renita Chaney Hill, who says she was just 15 and an aspiring actress when she met Bill Cosby after her modeling agency sent her on an audition for "Picture Pages,"** a series of educational videos Cosby was producing in Pittsburgh in the mid-1980s.

November 22, 2014

The Washington Post publishes the results of a long investigation into the allegations, including an interview with a new accuser: former Playmate Victoria Valentino, who says Cosby drugged and assaulted her and a friend in 1970.

November 23, 2014

Former Cosby Show employee Frank Scotti says he was in charge of delivering payoffs to eight different women. In his words, "It was a coverup." Scotti also claims that he stood guard outside Cosby's dressing room while the comedian conducted "interviews" with young models, all supplied by an agency he had an "arrangement" with.

November 24, 2014

Model Jewel Allison accuses Cosby of drugging and assaulting her in the late '80s. She recalls accepting a dinner invitation to Cosby's home, where he poured her a glass of wine. Allison says now she thinks the wine was drugged. "I looked at myself in the mirror and I didn't look good," she tells the *New York Daily News*.

December 2, 2014

Judy Huth accuses Cosby of assaulting her when she was 15. Huth claims that she and a friend met Cosby when they wandered onto a movie set in 1974. A week later, she says, the comedian took them to a party at the Playboy Mansion. There, Huth claims Cosby told her to lie about her age; then, when the two were alone, Cosby stuck his hand down her pants and forced her to masturbate him.

December 11, 2014

Model Beverly Johnson accuses Cosby of drugging her in the mid-'80s. Johnson tells *Vanity Fair* the comedian insisted she try a cappuccino from his home espresso machine; after two sips, she knew it was drugged. Before passing out, she remembers calling Cosby "a motherfucker," which annoyed him so much he dragged her out of his house and hailed her a cab.

So far, 48 women have publicly accused Bill Cosby of assaulting them.

6. If, Bill Cosby denies each allegation under oath, fully and completely; Gibbs will dismiss this Motion to Intervene with prejudice. If, some allegations are denied and others are admitted: Gibbs will redact the allegations denied.

7. Gibbs's letter [Edited] to NYC Mayor Bill de Blasio evidences Gibbs's qualifications and why Gibbs believes an attempt will be made to destroy Gibbs and any attorney discovering the TRUTH concerning the Racketeering Influence Corrupt Organization; the letter is included as follows:

M. Eugene Gibbs,[Esq.] Retired NYC-PD
XXXX XXXXXXXXXX Drive
XXXXXXX, XXXXXX XXXX
(XXX) XXX-XXXX
E-Mail: mystolenart@aol.com

December 5, 2014

Hon. Mayor Bill de Blasio
City Hall
New York, NY 10007

cc: Police Commissioner William J. Bratton, First Deputy Commissioner Benjamin Tucker and
Charlie Beck, Chief of Police, LAPD

Re: NYC-PD and RACE
[William "Bill" Cosby: RAPE and Stolen Art]

By way of introduction: 40 years ago Police Commissioner Michael Codd requested I participate in the conference on race at Major de Seversky; at the conclusion of the conference I co-wrote NYC-PD's "position paper" on race. I was assigned to the 69th Pct., but did not realize the police officer removed to create a space for me was: First Deputy Commissioner Benjamin Tucker....

My first encounter with Commissioner Codd – I was assigned to the 79th Pct. and Codd was Commander of Brooklyn North. Several White officers beat a student beyond recognition; at Boys High School (832 Marcy Avenue, B'klyn). The event caused a riot; trapping three officers in the school. When I arrived students were throwing items from the windows: chairs, trash cans, books and all that wasn't nailed down. I walked in the courtyard and yelled, "STOP". The school became silent and I motioned for the three officers to walk out of the school. My captain informed Codd I had stopped another riot; caused when two White cops arrested a nine month pregnant Black woman. They cuffed her hands behind her back; she struggled while asking, "Why are you arresting me and not the landlord?" The officers pushed her stomach first into the

rear side panel of the police car – Bed-Sty erupted. Codd asked me to accept Boys High as an assignment. I was assigned – BOYS HIGH SCHOOL is my alma mater....

I met Capt. Francis, Assistant Chief Inspector Eldridge Waith and Benjamin Ward, 45 years ago. They created a tutorial class with emphasis on math and math related problems, designed to recruit minorities. Benjamin Ward was selected to teach the math related sections.

After assisting Ward with several math equations – they (including Ward) asked me to teach the math classes. We recruited more minorities than at any time in NYC-PD's history.

My crusade to minimize police brutality and gain equality caused an irreconcilable difference and ended my police career. I never requested or accepted anything from Waith; and the only request I made of Codd was to be transferred from the 79th Pct. to the 73rd Pct. This was after 16 cops beat a Black woman who died. I wasn't working the night it happened, but I sought justice for her family. When I sought assistance from outside the department, my connection to Codd was severed. In 1971 I wrote:

(©1971) **"Systematic Murder"**

Protect and guide my youth, so they may build a nation-strong
 There are many subtle pitfalls they must clear to avoid the systematic wrong
 To build a nation, we all must make a contribution before we die
 And when young life is wasted, we must demand of ourselves why
 Remember my young, Clifford Glover, Claude Reese
 Both so young, and now listed as deceased
 Not shooting dope or in a far off corner smoking pot
 But, from a single racist bullet, ringing from a single systematic shot
 The system declare, the press write, what a tragic mistake
 I say to the system, give back the life you did take
 Black media and people, you say Officers Bosco and Shea have
 Committed murder by taking two of our youthful lives
 I say to you stop the rhetoric and non-sense, it is the same
 "System" that for years have raped our sisters and wives.¹

Tears of a Cop

I have been where you fear to go... I have seen what you fear to see...
 I have done what you fear to do... All these things I've done for you.
 I am the one you lean upon... The one you cast your scorn upon...
 The one you bring your troubles to... All these people I've been for you.
 The one you ask to stand apart... The one you feel should have no heart...
 The one you call the man in blue... But I am human just like you.
 And through the years I've come to see... That I'm not what you ask of me...
 And when you watch a person die... And hear a battered baby cry...
 Then so you think that you can be... All those things you ask of me...?
 So take this badge and take this gun... Will you take it? Will anyone?

© **Unknown Cop**

¹ "...I was born poor – and colored – and almost all the prettiest roses I have seen have been in rich people's yards, not in mine. That is why I cannot write exclusively about roses and moonlight – for sometimes in the moonlight my brothers see a fiery cross and a circle of Klansmen's hoods. Sometimes in the moonlight a dark body swings from a lynching tree, but for his funeral there are no roses." *Langston Hughes*

Fast forward – 20 years ago my law firm (Gibbs, Scott & Redmond) was retained to represent the Estate of the late Black artist, William H. Johnson. It was my belief that a few works of art would be recovered valued at about \$250,000. My investigation revealed the Harmon Foundation stole 2,000 works of art by Johnson - \$10 Billion and 1,000 works of art belonging to 200 Black artists - \$10 Billion and a connection to the Dr. Barnes Art Trust - \$30 Billion: see, *The Art of the Steal*, by Don Argott. During my conversation with Dr. Johnnetta Cole (former President Spellman College), Dr. Cole stated, “I do not have any of the art, but you are about to open a ‘can of worms’ that you have no idea.”

Dr. David Driskell “oversaw” the thefts by the Harmon Foundation. When Driskell resigned as Chairman Art Department, Fisk University to accept the same position at the University of Maryland – Driskell stole artwork valued at more than \$100 million. Driskell became Curator of William “Bill” Cosby’s art collection. Having teamed with Cosby – they gained control of \$\$\$ billion [estimated to be \$10 billion] of stolen Black art at the Smithsonian Institution, and stole art from the Dr. Barnes Trust [Valued at \$30 Billion].

The stolen art was used to corrupt politicians, lawyers, judges and public figures. Bill Cosby is “protected” by a person or persons in the Justice Department. The political “system” we believe we have do not exist. Congress is controlled – “key” members are controlled by stolen art. I believed members of Congress were dedicated to serving their constituency. Wrong, there is a corrupt structure in place to serve the rich: below are the realities hidden from America:

...while litigating the stolen art I appeared on CBS Sunday Morning, BET Television, ABC – News (New York), NBC – News (Savannah, Georgia), NBC – News (Florence, SC), Channel 21 News – Washington, DC area, Washington Post, etc....

My illegal arrest (2003), indictment and tortured confession were secured for the sole purpose of preventing me from exposing the art thefts.... AUSA James Trusty on behalf of the Justice Department ordered me to be tortured; to force me to confess to a crime that Trusty knew had not been committed. USA James Trusty conspired with an individual(s) to ensure I was denied bail: using a 16 year old nolle prosequi, domestic charge. Trusty knew the charge arose from me being placed on steroids to save my life due to a lung disease: Sarcoidosis² – I was taking 60 mg of Prednisone (Steroid) per day for months. My dosage was reduced to 20 mg a day over a few days, causing me to become mentally unstable – the dosage should have been reduced over several months.

AUSA James Trusty stood before Judge Day and stated, “Well, these pleadings in terms - they probably will not generate counts by way of criminal conduct because it is my understanding that with the time stamp it shows they were hand delivered, and I’m not sure if there is any - they would not be covered by mailing or writing threatening communications. ...During Mr. Gibbs,

² My wife testified, “I did not understand the effects of ‘steroids’ and when our doctor explained the causation, and my husband having been loving and caring for more than 30 years without incident, I dropped the charges.

60 years we cannot find so much as a speeding ticket.” [sic] ...then I was “flagged” by the Justice Department.

My **TORTURE** over 18 months included but was not limited as follow:³ Forced to stay in a prison cell 23 hours a day where the temperature exceeded 105 degrees; Denied law library privileges, pen and pencil, legal documents not filed with the court; Forced to stand outside in 30 degree weather in a tee-shirt; Transported in a steel cage to which there was no escape during a catastrophic accident, and the heat turned off in winter and the air conditioning turned off in the summer – I came very close to death; Flown thousands of miles over several days to travel less than 200 miles; Forced to undergo sleep deprivation prior to court appearances.

The Chief Judge (Federal District Court) removed my case from the assigned judge and reassigned it to the Chief Judge of another state: illegal; I was not notified nor was a hearing held: illegal; “They” did not issue an order or cause an entry to be made on the DOCKET: both illegal.

When “they” destroyed me and my law firm, in addition to litigating the largest art conspiracy in history, I was in the process of developing a means to quantify pain in personal injury cases:

Expert reconstruction of the accident using a robotic “cadaver” while explaining the actual effects of pain – $E=mgh$, $E=(\frac{1}{2})kx^2$, $x=\sqrt{2mgh/k}$, $f=kx=\sqrt{2mghk}$. Investigating two innocent Black Men having been executed (1950s) in Florence, South Carolina. In one case, a White doctor on his “death bed” confessed to having killed his wife and “staged” the evidence to convict his Black gardener. The other case involved “covering up” two murders committed by a White politician’s mentally challenged son – the son was in love with the female victim. Police women were relegated to clerical duties and jail matrons. Gibbs encouraged Hilda Hubbard and Iren Niles to seek equal patrol rights and supported every effort they undertook. ...it was Contracts (class) that prevented me from completing law school in two years. Pursuant to ABA Guidelines, I would have been required to attend law school for two and one-half years. I “walked away” from law school for eight years prior to returning to graduate.

“They” offered me \$5 million to throw my clients under the bus; an offer I would never consider. But the offer was insulting based on the fact this would have been less than one-half of one per cent of the value of the art.

Peter Stern, Esq., assisted by James Bogle, Sr. Ass AG, South Carolina, had me falsely arrested, tortured and convicted to conceal the largest art conspiracy in American history: assisted by **AUSA James Trusty – he rigged the grand jury: there was no crime, no victim or witness PRESENTED TO THE GRAND JURY.** AND, AUSA Neil Corwin – he stopped the investigation by the FBI Art Theft Unit, Queens, New York. For additional information: see, mystolenart.com.

³ I was illegally detained from August 2003 to September 2004, 13 months. The conditions were so atrocious at one facility – judges “gave” 2 days for every day served; thus I was imprisoned for 13 months.

PROFFER –

The FBI falsely arrested Gibbs and confiscated (never returned) Gibbs' case file – **Gibbs v. Smithsonian Institution**. The file was protected by attorney client privilege; yet AUSA Jim Trusty distorted facts in the file to effect Gibbs' prosecution.

Gibbs highlighted his prosecution strategy of the stolen art case in a manner to convict the perpetrators and secure damages, to wit:

I dismissed Ms. Oprah Winfrey from the litigation in February 2001. Ms. Winfrey signed an affidavit attesting to the fact she did not possess stolen art. The suit provided Ms. Winfrey each and every detail concerning the stolen art. Yet, August 2001, Ms. Winfrey had Bill Cosby appear on her show to promote his stolen art.... (Accessory after the fact at a minimum)

Michael Rosenfeld (Gallery) used a bogus purchase from the Mary Beatie Brady Estate to provide cover for art stolen from Historical Black Colleges and Universities (HBCUs): Fisk, Howard, Hampton, Tuskegee, Morgan State and Clark Atlanta Universities – Chiefly, the William H. Johnson painting “Sarah” was stolen from Tuskegee University. Mary Beatie Brady as President of the Harmon Foundation was responsible for the theft of 2,000 works of art by William H. Johnson, and 1,000 works of art by 200 Black artist. OBSERVATION: Michael Rosenfeld is the weak link in the corrupt organization and will “rat” on his mother to avoid jail time,

Dr. Richard Powell, as a young art student, was coerced into a love affair with an older professor, Dr. David Driskell. When Driskell departed Fisk University as Chairman of the Art Department to take the same position at the University of Maryland – Driskell stole more than 100 paintings from Fisk University: those paintings are valued at more than \$100 million. Dr. Driskell became curator of Bill Cosby's art collection and Driskell and Cosby extended their thefts to the **Dr. Barnes Art Trust** [\$30 Billion].... Dr. Powell is weak and cannot withstand interrogation as to the facts of the case: he will reveal – who, when, where and how...the why is tied to great financial gain,

The Smithsonian Institution discovered they are in possession of stolen Black art having a value of more than \$10 Billion. In order to cover-up the theft, the Smithsonian joined with Dr. Driskell to have Dr. Powell to create a false provenance for the stolen art work.

Why would the Justice Department “protect” William “Bill” Cosby and Rep. John Lewis (D-GA)? It would be at the request of “powerful” people or Cosby and Lewis were used as informants – spying on Dr. King and the Civil Rights Movement. Bill Cosby can be compared to Vito Corleone (God-Father). If I was an investigator on the Ennis Cosby murder case, I would re-open the case.... There are several books in the conspiracy: Dr. Richard Powell, **Homecoming – The Art and Life of William H. Johnson**; Dr. David Cl. Driskell, **The other Side of Color – African American Art in the Collection of Camille O. and William H. Cosby Jr.**; NOVAE: **William H. Johnson**. And exposing the conspiracy: Steve Turner & Victoria Dailey, **William H. Johnson – Truth Be Told**. Film: **The Art of the Seal**, Don Argott, and more than 300 documents retrieved from the Library of Congress (Madison Building), Inspector General (Smithsonian Institution) and the National Achieves. ADDITIONALLY, I've

written: M.E. (Melvin Eugene) The Last Angry Cop!... first pinned (2011) as "I Am No Ordinary Negro!" – taken from a letter written by William H. Johnson in 1938.

What happened to me is an example of the fate that awaited the women "drug" raped ... had they come forward 20, 30 or 40 years ago.

In the event of my death or incapacity any and all investigations must begin and end HERE!

If there exist any doubts concerning these stated facts, invite Al Sharpton, the NAACP and members of the Black Caucus to a meeting and reveal the contents of the art thefts and request their opinions as to what should be done. Jointly request the opinion of the three senators and three representatives on the Smithsonian's board of regents and those in power at the Smithsonian; particularly the Museum of American Art.

I was recruited to play Basketball by legendary Boys High School Coach Mickey Fisher, who informed me, "If you don't know the players, you can't keep score."

Thanking you in advance for your considerations....

With warm regards, I remain

/s/

M. "Mel" Eugene Gibbs

8. Defendant cannot be allowed to usurp the "Scales of Justice" which has become part of our shared cultural fabric. The public and attorneys in general and Gibbs in particular have a right of discourse through litigation without fear of intimidation and/or bodily harm.

Bill Cosby: Rape and Stolen Art \$50 [B]illion – Cosby has can be prosecuted: CRIMINAL and CIVIL LITIGATION under conspiracy and racketeering (RICO) [18 USC § 1961 et seq. (§ 1964).... William Morris Agency, J.F. Images, Denver's top agency at the time; Bill Cosby's "right hand" men and body guards; Bill Cosby's staff – Manhattan Brownstone and Pennsylvania Home, those who watched the "door" so Cosby would not be interrupted, etc... Bill Cosby maintained and advanced rape against women and men when Cosby hired Dr. David Driskell. Cosby and Driskell were able to convince judges and politicians to turn a "blind eye" to their rapes by dolling out stolen art. Every woman: all 48 of them and a prosecutor can file under RICO: Racketeering Influence Corrupt Organization....

NOW, the "well oiled" Bill Cosby "spin doctors" are embedding a lie in the public domain: "The statutes of limitations have expired and the aggrieved women do not have a cause of action at law." Talent agencies and others joined with Bill Cosby and conspired to procure young girls to satisfy Cosby's criminal enterprise. These acts are in violation of causes of action for conspiracy, racketeering, commerce clause and the laws of the states in which the crimes occurred. AND, Bill Cosby's legal team and public relation agency have become part and partial to the racketeering and pursuant to law must be severed:

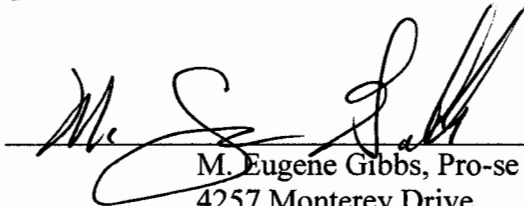
The court sided with the prosecutors, contending that Cutler [John Gotti's Attorney] was the "in-house counsel" for the Gambino family and must be severed, U.S. v. GOTTI, 9 F.Supp.2d 320 (1998).

CONCLUSION:

For the foregoing reasons, Gibbs must be provided a litigation environment free from intimidation and corruption: this Honorable Court must order the full and complete transcript released, and deny any and all attempts to sanction Plaintiff and/her attorneys.

RELIEF:

WHEREFORE, Gibbs prays this Honorable Court will grant the Motion to Intervene, deny any and all relief requested by Defendant, and such other and further relief as this Court deems just and proper.


M. Eugene Gibbs, Pro-se
4257 Monterey Drive
Florence, SC 29501
mgibbs70@aol.com


Dated: July 25, 2015
Florence, South Carolina

CERTIFICATE OF SERVICE

I, Melvin E. Gibbs, hereby certify that a copy of this motion to intervene was electronically transmitted via Email and/or placed with USPS, postage prepaid, this 25th day of July 2015, addressed to:

Bill Cosby's Attorney
Patrick J. O'Connor
Cozen O'Connor
One Liberty Place
1650 Market Street
Philadelphia, PA 19103

Dolores M. Troiani, Esq
131 Lancaster Ave
Devon, PA 19333-1503

A handwritten signature in black ink, appearing to read 'Melvin E. Gibbs', is written over a horizontal line.

Melvin E. Gibbs
4257 Monterey Drive
Florence, SC 29501

United States District Court
For Eastern District of Pennsylvania

ANDREA CONSTAND,

Plaintiff,

v.

WILLIAM H. COSBY, JR.,

Defendant.

CIVIL ACTION NO:

05-cv-1099

**ORAL ARGUMENT
REQUESTED**

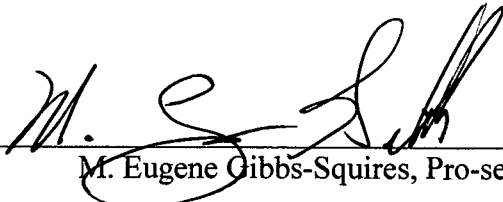
I, M. Eugene Gibbs, hereby declare:

I am a retired New York City police officer, and attorney of record in the largest art conspiracy and racketeering case in American history.

I submit this Declaration in support of my Motion to Intervene, attached hereto.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Executed on:
July 24, 2015
Florence, South Carolina


M. Eugene Gibbs-Squires, Pro-se